

AKIN GUMP STRAUSS HAUER & FELD LLP AKIN GUMP STRAUSS HAUER & FELD LLP

Michael S. Stamer (*pro hac vice*)

Ira S. Dizengoff (*pro hac vice*)

David H. Botter (*pro hac vice*)

Abid Qureshi (*pro hac vice*)

One Bryant Park

New York, New York 10036

Telephone: (212) 872-1000

Facsimile: (212) 872-1002

Email: mstamer@akingump.com

idizengoff@akingump.com

dbotter@akingump.com

aqureshi@akingump.com

Ashley Vinson Crawford (SBN 257246)

580 California Street

Suite 1500

San Francisco, CA 94104

Telephone: (415) 765-9500

Facsimile: (415) 765-9501

Email: avcrawford@akingump.com

*Counsel to the Ad Hoc Committee of Senior Unsecured  
Noteholders of Pacific Gas and Electric Company*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER OF THE AD HOC COMMITTEE  
OF SENIOR UNSECURED  
NOTEHOLDERS TO OBJECTION OF THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS' TO THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS'  
BAR DATE MOTION**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case, No.  
19-30088 (DM).*

**Hearing**

Date: June 26, 2019

Time: 9:30 a.m. (Pacific Time)

Place: Courtroom 17

450 Golden Gate Ave, 16th Floor

San Francisco, CA 94102

**Re:** Docket Nos. 2297, 2650

1 The Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company  
2 (the “Ad Hoc Committee”) in the above-captioned chapter 11 cases of Pacific Gas and Electric Company  
3 (the “Utility”) and PG&E Corporation (“PG&E” and, together with the Utility, the “Debtors”), by its  
4 undersigned counsel, Akin Gump Strauss Hauer & Feld LLP, hereby joins (the “Joinder”) the *Objection*  
5 *of the Official Committee of Unsecured Creditors to the Official Committee of Tort Claimant’s Bar Date*  
6 *Motion* [Docket. No. 2650] (the “UCC Objection”).<sup>1</sup> In support of the Joinder, the Ad Hoc Committee  
7 respectfully states the following:

8 **JOINDER**

9 1. Pursuant to the *Motion of the Official Committee of Tort Claimants Pursuant to 11 U.S.C.*  
10 *§§ 105(a), 501, and Fed. R. Bankr. P. 3001(a), 3003(c), 5005 and 9007 for Entry of an Order (I)*  
11 *Establishing a Bar Date for Filing Fire Claims, (II) Approving the Form and Procedures for Notice of*  
12 *the Bar Date for Fire Claims, and (III) Approving Supplemental Procedures for Notice of the Bar Date*  
13 *to Fire Claimants* [Docket No. 2297] (the “TCC Bar Date Motion”), the Official Committee of Tort  
14 Claimants seeks a bar date for fire victims of January 31, 2020, a date more than seven months from now  
15 and a full year from the date these cases were commenced. While the Ad Hoc Committee is aware of  
16 the difficulties the tort claimants may face in filing proofs of claim, the Ad Hoc Committee shares the  
17 concerns of the Official Committee of Unsecured Creditors (the “UCC”) regarding the attempts of the  
18 Official Committee of Tort Claimants (the “TCC”) to cause a significant delay in the administration of  
19 these cases. Indeed, if the news reports are accurate, Governor Newsom’s contemplated legislation to  
20 create a fund to pay future wildfire claims requires PG&E to have emerged from these proceedings by  
21 June 30, 2020 in order to participate in the fund.<sup>2</sup> As a result, the Ad Hoc Committee joins in the UCC  
22 Objection and agrees with the UCC, and indeed, prior statements made by the TCC,<sup>3</sup> that it is in the best  
23 interest of all parties, including the tort claimants, that this case move forward as quickly as possible so  
24 that all creditors, including the wildfire victims, can be paid and reorganized PG&E and its constituents  
25

26  
27 <sup>1</sup> Capitalized terms used, but not defined, herein shall have the meanings ascribed to them in the UCC Objection.

28 <sup>2</sup> See Mark Chediak, *If PG&E Wants Newsom’s Wildfire Aid, Here’s What It Has to Do*, Bloomberg (June 21, 2019)  
<https://www.bloomberg.com/news/articles/2019-06-21/if-pg-e-wants-newsom-s-wildfire-aid-here-s-what-it-has-to-do>.

<sup>3</sup> See UCC Objection at 2.

can benefit from any legislation that is subsequently enacted.

2. The Ad Hoc Committee strongly believes that the extension proposed by the TCC in the TCC Bar Date Motion is not in the best interest of any party in these cases, including the TCC's constituents. The Ad Hoc Committee has maintained throughout the pendency of these chapter 11 cases that all key stakeholders should focus their efforts on building consensus with respect to a confirmable chapter 11 plan and the Debtors' exiting from bankruptcy as soon as possible. The establishment of a bar date in the near term is essential to these efforts as it will provide the key stakeholders with critical information regarding the nature and scope of claims in these chapter 11 cases. Granting the relief requested in the TCC Bar Date Motion and setting the bar date on January 31, 2020 could delay unnecessarily the conclusion of the Debtor's bankruptcy, thereby delaying creditor recoveries.

3. Additionally, Ad Hoc Committee echoes the UCC's request that the TCC share the claims information in the BrownGreer database with all major parties in interest, particularly in light of the Debtors' acceptance of the TCC's proposed proof of claim form for fire victims, a form which calls for little information. Denying other stakeholders relevant information about the universe of claims and forcing them to devote attention to a discovery process in order to get such information can only serve to hinder and delay the claims reconciliation process and arriving at a successful conclusion to these cases.

4. Despite the TCC's prior assertions that they seek an expeditious emergence from bankruptcy and payment of creditor claims, granting the relief requested in the TCC Bar Date Motion would accomplish neither. The best course of action here is for all parties in interest to work together in good faith (i) to gather and share all necessary wildfire claims information as quickly as possible and (ii) to try to reach a resolution on any open issue that could delay confirmation of a chapter 11 plan and the Debtors' emergence from chapter 11.

## RESERVATION OF RIGHTS

5. The Ad Hoc Committee reserves the right to raise further and other objections to the Motion at the hearing as may be necessary or appropriate.

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1       **WHEREFORE**, for the foregoing reasons, the Ad Hoc Committee respectfully requests that the  
2 Court (i) sustain the UCC Objection to the TCC Bar Date Motion; (ii) approve the Debtors' Proposed  
3 Bar Date; and (iii) grant such other and further relief as is just, equitable and proper.  
4

5       Dated: June 21, 2019

6                               **AKIN GUMP STRAUSS HAUER & FELD LLP**

7       By: 

8               David H. Botter (*pro hac vice*)

9               Michael S. Stamer (*pro hac vice*)

10              Ira S. Dizengoff (*pro hac vice*)

11              Abid Qureshi (*pro hac vice*)

12              Ashley Vinson Crawford (SBN 257246)

13                               *Counsel to the Ad Hoc Committee of Senior Unsecured*  
14                               *Noteholders of Pacific Gas and Electric Company*  
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